

Line No. 1903 Pipeline Conversion Project

Fire Prevention and Suppression Plan

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FIRE PREVENTION AND SUPPRESSION PLAN

1. INTRODUCTION

The Fire Prevention and Suppression Plan (Plan) identifies measures to be taken by El Paso Natural Gas (El Paso) and its contractors (Contractor) to ensure that fire prevention and suppression techniques are carried out in accordance with federal, state, and local regulations. Measures identified in this Plan apply to work within the project area defined as the right-of-way (ROW), access roads, all work and storage areas, and other areas used during construction of the project. This Plan was developed in consideration of the U.S. Department of Interior, Bureau of Land Management (BLM) ROW Plans of Development and Grants, BLM Manual Handbook H-2901-1.

2. PURPOSE

The risk of fire danger during pipeline construction is related to smoking, refueling activities, operating vehicles and other equipment off roadways, welding activities, and the use of explosive materials and flammable liquids. During pipeline operation, risk of fire is primarily from unauthorized entry onto the ROW. During maintenance operations, risk of fire is from vehicles and pipeline maintenance activities that require welding.

This Plan establishes standards and practices that will minimize the risk of fire danger and, in case of fire, provide for immediate suppression.

3. RESPONSIBILITIES AND COORDINATION

This Plan will be implemented by El Paso and the Contractor on the project. El Paso and the Contractor have the responsibility for providing all necessary fire-fighting equipment on the project site to their respective employees, and operating under the requirements of this Plan. Prior to construction, El Paso will contact the appropriate authorities to establish communications, obtain permits (if applicable), and/or fulfill other obligations as directed by fire control authorities. In addition to the above, El Paso will:

- Ensure that prevention, detection, pre-suppression, and suppression activities are in accordance with this Plan and federal, state, and county laws, ordinances, and regulations pertaining to fire;
- Accompany agency representatives on fire tool and equipment inspections and take corrective action upon notification of any fire protection requirements that are not in compliance; and
- Restrict operations on federal lands during conditions of high fire danger as directed by the BLM as described in Section 4.1.11, Restricted Operations.

The fire prevention and suppression measures described in this Plan will be in effect from the start of construction to the end of construction. These restrictions may change by advance written notice by fire control authorities. However, required tools and equipment will be kept in serviceable condition and be immediately available for fire suppression at all times.

4. FIRE PREVENTION MEASURES

4.1 Preconstruction and Construction

Methods and procedures that will be implemented prior to and during the construction period to minimize the risk of fire are described below.

4.1.1 Training

The Contractor will train all personnel about the measures to take in the event of a fire. The Contractor also will inform each construction crewmember of fire dangers, locations of extinguishers and equipment, and individual responsibilities for fire prevention and suppression during regular safety briefings. Smoking and fire rules also will be discussed with the Contractor and all field personnel during the project's environmental training program.

4.1.2 Smoking

Smoking is prohibited except in areas cleared and graded a minimum of 10 feet in diameter to mineral soil. All burning tobacco and matches will be extinguished before discarding. Smoking also is prohibited while operating equipment or vehicles, except in enclosed cabs or vehicles.

4.1.3 Spark Arresters

During construction, operation, maintenance, and termination of the ROW, all equipment operating with an internal combustion engine will be equipped with federally approved spark arresters. Spark arresters are not required on trucks, buses, and passenger vehicles (excluding motorcycles) that are equipped with an unaltered muffler or on diesel engines equipped with a turbocharger. Agency fire prevention officers will have full authority to inspect spark arresters on project equipment prior to its use on the project on federal lands and periodically during the construction project.

4.1.4 Parking, Vehicle operation, and Storage Areas

In no case will motorized equipment, including worker transportation vehicles, be driven or parked outside of the designated and approved work limits. Equipment parking areas, the ROW, staging areas, designated vehicle-parking areas, and small stationary engine sites, where permitted, will be cleared of all flammable material. Clearing will extend a minimum of 10 feet beyond the edge of the area to be occupied, but not beyond the boundaries of the approved ROW, extra workspace, or ancillary site. Glass containers will not be used to store gasoline or other flammables.

4.1.5 Equipment

All motor vehicles and equipment will carry at least one long-handled (48-inch minimum), round-point shovel and one dry chemical fire extinguisher (5 B.C.). Individuals using power saws and grinders will have a shovel as described above, and an 8-ounce capacity fire extinguisher immediately available. All equipment will be kept in a serviceable condition and readily available.

4.1.6 Road Closures

The Contractor will notify the appropriate fire suppression agency of the scheduled closures prior to the open-cut crossing of a road. If required, the Contractor will construct a bypass prior to the open-cut installation of a road crossing, unless a convenient detour can be established on existing project approved roads or within project approved work limits. All bypasses will be clearly marked by the Contractor. During road closures the Contractor will designate one person, who knows the bypass, to direct traffic. The Contractor will minimize, to the extent possible, the duration of road closures.

4.1.7 Refueling

Fuel trucks will have a large fire extinguisher charged with the appropriate chemical to control electrical and gas fires. The extinguisher will be a minimum size 35-pound capacity with a minimum 30 B.C. rating. Power saw refueling will be done in an area that has first been cleared of material that could catch fire.

4.1.8 Burning

No burning of slash, brush, stumps, trash, explosives storage boxes, or other project debris will be permitted on the project. No lunch or warming fires or barbecue grills will be allowed.

4.1.9 Fire Guard

The Contractor will designate a Fire Guard on each construction crew prior to the start of construction activities each day. The Fire Guard must be physically able, vigilant, and suitably trained to detect fires and use required fire-fighting equipment, according to the requirements specified in the Construction Safety Manual (Appendix L). An alternate or back-up Fire Guard will be designated to assume responsibility, if the primary guard is unable to perform their duties. The Contractor will provide, if required by El Paso, additional fire watch-people with radio communication to the Fire Guard should construction activities be too widely spread for one Fire Guard to manage effectively.

4.1.10 Fire Guard Communications

The Fire Guard will be responsible for maintaining contact with fire control agencies, and will be equipped with a radio or cellular telephone so immediate contact with local fire control agencies can be made. If cellular telephone coverage is not available, the Fire Guard will use the Contractor's frequency to contact their radio base at the Contractor's yard. From there, yard personnel will telephone emergency dispatch.

4.1.11 Welding

One 5-gallon backpack pump will be required with each welding unit in addition to the standard fire equipment required in all vehicles. All equipment will be kept in a serviceable condition and readily available.

4.1.12 Restricted Operations

The Contractor will restrict or cease operations on federal lands during periods of high fire danger at the direction of the BLM Fire Management Officer. Restrictions may vary from stopping certain operations at a given time to stopping all operations. El Paso may obtain approval to continue some or all operations if acceptable precautions are implemented.

The responsible BLM Fire Management Officer will notify El Paso the previous day if fire danger predictions call for restrictions the following day. If a sudden change in fire danger requires restrictions during the day, the BLM Fire Management Officer will notify El Paso immediately. El Paso will then notify the Contractor to restrict activities as soon as possible.

4.1.13 Monitoring

Construction and Environmental Inspectors for El Paso will inspect the job site and the Contractor's operations for compliance with all provisions of this Plan. In addition, federal, state, and local fire control agencies may perform inspections in areas under their jurisdiction at their discretion.

4.2 Pipeline Operation

During pipeline operation, the risk of fire danger is minimal. The primary causes of fire on the ROW result from unauthorized entry by individuals utilizing the ROW for recreational purposes and from fires started outside of the ROW. In the latter case, authorities can use the ROW as a potential firebreak. During pipeline operation, access to the ROW will be restricted, in accordance with jurisdictional agency or landowner requirements, to minimize recreational use of the ROW.

4.3 Pipeline Maintenance

During maintenance operations, El Paso or its Contractor will equip personnel with basic fire-fighting equipment including fire extinguishers and shovels as described in Section 4.1.5, Equipment. Maintenance crews also will carry emergency response/fire control contact phone numbers.

5. FIRE SUPPRESSION

5.1 Suppression

The Contractor will take the following actions should a fire occur within the project area during construction.

- Take immediate action to suppress fires using all available manpower and equipment.
- Notify the Fire Guard.
- Immediately notify the nearest fire suppression agency of the fire location, action taken, and status (See Section 6.2).
- Immediately notify El Paso of the fire location and action taken.
- Relinquish the Fire Guard's direction of fire suppression activities to agency fire management officers upon their arrival.

Note: If required, personnel only may leave the ROW boundaries to accomplish fire suppression. Heavy equipment is not to leave the ROW to suppress a fire unless directed by a BLM Representative on federal lands or by the state or local fire officials on private and state lands.

If a reported fire is controlled, the Fire Guard will note the location and monitor the progress in extinguishing the fire. The Fire Guard, or their designee, will remain at the fire scene until it is fully extinguished. The extinguished fire will be monitored in accordance with procedures described in Section 5.2 below.

When requested by the BLM Fire Management Officer, the Contractor will make any equipment and personnel currently at the site temporarily available for fighting fires in the vicinity of the project. Payment for such services will be made at rates determined by the BLM Fire Management Officer.

5.2 Monitoring

The Contractor will mark the location and boundaries of all extinguished fires. The extinguished fire site will be monitored by the Contractor for a minimum of 24 hours. Monitoring includes walking the fire site perimeter, as well as crossing through the site. The Fire Guard will maintain a log of all extinguished fire locations for future reference.

6. NOTIFICATION

6.1 Notification Procedures

Construction crewmembers will report all fires, whether extinguished or uncontrolled, to the Fire Guard. If the fire is uncontrolled, the Contractor's Fire Guard will call the nearest fire suppression agency (call 911) and the El Paso Chief Inspector. Information regarding the location of the fire, property ownership, and closest access roads should be provided to the 911 Operator and El Paso.

If a reported fire is controlled, but not extinguished, the Fire Guard will call to notify the nearest police/fire authorities (See Section 6.2) using the non-emergency telephone line to alert them of the situation. The status of the fire will be monitored by the Fire Guard and when extinguished, the nearest fire suppression agency will be notified.

El Paso also will immediately contact the nearest landowner(s). El Paso will maintain and provide the Contractor with an up-to-date list of landowner and land management agency contacts along the pipeline ROW.

6.2 Contacts

Emergency contacts are as follows:

Construction	Phone Number	Office Location	BLM Contact
Arizona			
La Paz County	911 311 520-669-2281	Emergency Number Non-Emergency Number County Sheriffs Office	
California			
Kern County	911 661-861-3110	Emergency Number County Sheriffs Office	
Riverside County	911 909-776-1099	Emergency Number County Sheriffs Office	
San Bernardino County	911 909-387-0658	Emergency Number County Sheriffs Office (Non-Emergency)	

7. REFERENCES

Bureau of Land Management (BLM). Right-of-Way Plans of Development and Grants, BLM Manual Handbook H-2901-1.